

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN MANUFACTURERS MUTUAL
INSURANCE COMPANY,

Plaintiff,

vs.

TOWN OF NORTH BROOKFIELD,

Defendant.

Civil Action No. 03-40266-CBS

AFFIDAVIT OF DEBORAH S. GRIFFIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

I, Deborah S. Griffin, am an attorney in the Boston office of Holland & Knight LLP and counsel of record for American Manufacturers Mutual Insurance Company ("AMMIC") in this matter. I have personal knowledge of the following, except where stated to be upon information and belief. I make this affidavit in support of Plaintiff's Motion for Protective Order (the "Motion").

1. Attached hereto as Exhibit A is a true and accurate copy of relevant portions of Plaintiff's Amended Complaint filed December 3, 2003.

2. Attached hereto as Exhibit B is a true and accurate copy of relevant portions of the Town's Answer and Counterclaims filed January 30, 2004.

3. Attached hereto as Exhibit C is a true and accurate copy of relevant portions of the Town's First Set of Interrogatories served September 30, 2004.

4. Attached hereto as Exhibit D is a true and accurate copy of relevant portions of the Town's First Request for Production of Documents served September 30, 2004.

5. Attached hereto as Exhibit E is a true and accurate copy of relevant portions of AMMIC's Answers to the Town's First Set of Interrogatories served November 30, 2004.

6. Attached hereto as Exhibit F is a true and accurate copy of relevant portions of AMMIC's Responses to the Town's Request for Production of Documents served November 30, 2004.

7. Attached hereto as Exhibit G is a true and accurate copy of relevant portions of the Town's Rule 30(b)(6) Deposition Notice for AMMIC served March 24, 2005.

Signed under the penalties of perjury this 22nd day of April, 2005.

/s/ Deborah S. Griffin
Deborah S. Griffin

2785481_v1
431261.00002